

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:

RED RIVER TALC LLC,¹

Debtor.

Chapter 11

Case No. 24-90505 (CML)

**AGENDA FOR MATTERS SET FOR CONSOLIDATED HEARING
ON FEBRUARY 18, 2025 AT 9:00 A.M. (PREVAILING CENTRAL TIME)**

TO THE HONORABLE CHRISTOPHER M. LOPEZ:

The above-captioned debtor (the “Debtor”) files this Agenda of matters set for the *consolidated hearing* scheduled for **February 18, 2025 at 9:00 a.m. (prevailing Central Time)** before the Honorable Judge Christopher M. Lopez, United States Bankruptcy Judge, Courtroom 401, 4th Floor, 515 Rusk Street, Houston, Texas 77002:

I. Motions:

A. Claimant Kevin Nesko’s Motion to (1) Bar Debtor From Using the 30(b)(6) Deposition Testimony of Justin Lindenmayer at Trial; and (2) Allow Claimant Nesko to Use the Deposition Testimony of Thibaut Mongon at Trial; or (3) Alternatively, to Issue Subpoenas to Messrs. Mongon and Lindenmayer Under Rules 43(a) and 45(c) of the Federal Rules of Civil Procedure to Compel Their Appearances at Trial By Remote Transmission [Dkt. 1064, Adv. Dkt. 147] (the “Nesko Deposition Motion”).

Status: This matter is going forward.

Related Documents:

1. Debtor’s Objection to the Nesko Deposition Motion [Dkt. 1074, Adv. Dkt. 148].
2. Motion to Seal Nesko Deposition Motion [Dkt. 1079, Adv. Dkt. 149].

¹ The last four digits of the Debtor’s taxpayer identification number are 8508. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

B. Motion of the Coalition of Counsel for Justice for Talc Claimants to Dismiss the Chapter 11 Case Pursuant to 11 U.S.C. § 1112(b) [Dkt. 44] (the “Coalition Motion to Dismiss”) and Motion of the United States Trustee to Dismiss Case Under 11 U.S.C. § 1112(B) [Dkt. 299] (the “UST Motion to Dismiss”).

Status: These matters are going forward.

Related Documents:

1. Joinder of Claimants Represented by Barnes Law Group, LLC to Coalition Motion to Dismiss [Dkt. 302].
2. Joinder of Claimants Represented by Barnes Law Group, LLC to UST Motion to Dismiss [Dkt. 303].
3. Joinder of Claimants Represented by Goldstein Greco, P.C. to Coalition Motion to Dismiss [Dkt. 308].
4. Joinder of Claimants Represented by Goldstein Greco, P.C. to UST Motion to Dismiss [Dkt. 309].
5. Memorandum of Law Joining the UST Motion to Dismiss and the Coalition Motion to Dismiss [Dkt. 375].
6. J&J Insurers’ Joinder to UST Motion to Dismiss [Dkts. 376, 378].
7. Joinder in UST Motion to Dismiss [Dkt. 388].
8. Debtor’s Omnibus Objection to the Coalition Motion to Dismiss and the UST Motion to Dismiss [Dkt. 425].
9. Omnibus Objection of the Ad Hoc Committee of Supporting Counsel to Motions to Dismiss [Dkt. 426].
10. The SLF Claimants Corrected (I) Omnibus Objection to the Coalition Voting Pleadings and Cross-Motion Under Rule 3018(a), (II) Objection to the Motions to Dismiss, and (III) Joinder to Certain of the Debtor’s Pleadings, Including the Voting Results Motion [Dkt. 435] (the “SLF Claimants’ Objection and Joinder”).
11. U.S. Trustee Omnibus Reply and Reservation of Rights to Objection to Motion to Dismiss [Dkt. 619].
12. Reply in Support of Coalition Motion to Dismiss [Dkts. 623, 624].

13. Declaration of Sunni P. Beville in Support of Coalition of Counsel for Justice for the Replies filed on November 22,2024 [Dkt. 631, 632] (the “Beville Declaration”).
14. Motion of The Coalition of Counsel for Justice for Talc Claimants to File Under Seal and Redact Certain Exhibits Referenced in the Coalitions’ Reply Briefs Filed on November 22, 2024 [Dkt. 633] (the “Coalition Motion to Seal November 22, 2024 Replies”).
15. Notice of Joinder of Tamara Newsome to Pleadings Filed By the Coalition Of Counsel For Justice For Talc Claimants [Dkt. 1096] (the “Newsome Joinder to Certain Coalition Pleadings”).

C. Debtor’s Motion for Entry of an Order Approving (I) Adequacy of Disclosure Statement, (II) Solicitation Packages and Procedures Employed for the Solicitation and Tabulation of Votes on the Debtor’s Prepackaged Plan of Reorganization and (III) Notice of Non-Voting Status [Dkt. 46] (the “Disclosure Statement Motion”).

Status: This matter is going forward.

Related Documents:

1. Notice of Filing of Solicitation Versions of the Prepackaged Chapter 11 Plan of the Debtor and Related Disclosure Statement [Dkt. 25].
2. Declaration of Stephenie Kjontvedt of Epiq Corporate Restructuring, LLC, Regarding the Solicitation and Tabulation of Ballots Cast On the Prepackaged Chapter 11 Plan of Reorganization of the Debtor [Dkt. 47] (the “Kjontvedt Tabulation Declaration”).
3. Declaration of Shannon R. Wheatman, Ph.D. in Support of (I) Supplemental Notice Plan and (II) Report on Implementation of Supplemental Notice Plan [Dkt. 48] (the “Wheatman Declaration”).
4. Objection of the Coalition of Counsel for Justice for Talc Claimants to the Disclosure Statement Motion [Dkt. 268] (the “Coalition Disclosure Statement Objection”).
5. U.S. Trustee’s Consolidated Objection to the Disclosure Statement Motion and Motion for Entry of an Order Confirming the Results of Voting on the Prepackaged Plan of Reorganization (ECF No. 305) [Dkt. 395] (the “UST Disclosure Statement Objection”).
6. Insurers’ (A) Objection to the Disclosure Statement Motion, and (B) Preliminary Objection to Confirmation of the Plan [Dkt. 452] (the “Insurers’ Disclosure Statement and Plan Objection”).

7. Limited Joinder by Employers Insurance Company of Wausau and National Casualty Company to Insurers' Disclosure Statement Objection [Dkt. 454] (the "Employers Insurance Joinder to Insurers' Disclosure Statement and Plan Objection").
8. Allstate Insurance Company's Joinder to Insurers' Disclosure Statement and Plan Objection [Dkt. 459].
9. Affidavit of Publication *The Wall Street Journal* [Dkt. 470] (the "WSJ Affidavit").
10. Affidavit of Publication, *USA Today* [Dkt. 471] (the "USA Today Affidavit").
11. Affidavit of Publication, *New York Times* [Dkt. 537] (the "NYT Affidavit").
12. Debtor's Consolidated Reply in Support of the Disclosure Statement Motion [Dkts. 634, 635] (the "Disclosure Statement Reply").
13. Motion of the Debtor to Seal the Disclosure Statement Reply [Dkt. 636].
14. SLF Claimants' Claimants' Preliminary Joinder and Reply in Support of Debtor's (I) Voting Results Motion and (II) Disclosure Statement Motion [Dkt. 642] (the "SLF Claimants' Joinder and Reply").
15. Order Granting Motion of the Debtor to Seal the Disclosure Statement Reply [Dkt. 892].
16. The Newsome Joinder to Certain Coalition Pleadings.

D. Objection of the Coalition of Counsel for Justice for Talc Claimants to Debtor's Ex Parte Application for Entry of an Order Authorizing the Employment and Retention of Epiq Corporate and Emergency Ex Parte Motion for the Entry of an Order Reconsidering and Vacating the Ex Parte Order Authorizing the Employment and Retention of Epiq Corporate Restructuring, LLC as Claims, Noticing and Solicitation Agent [Dkt. 257] (the "Coalition Motion to Vacate") and U.S. Trustee Motion to Reconsider the Order Authorizing the Employment and Retention of Epiq Corporate Restructuring, LLC as Claims, Noticing, and Solicitation Agent [Dkt. 300] (the "UST Motion to Reconsider").

Status: These matters are going forward.

Related Documents:

1. Debtor's Emergency Ex Parte Application for Entry of an Order Authorizing the Employment and Retention of Epiq Corporate

Restructuring, LLC as Claims, Noticing and Solicitation Agent [Dkt. 19] (the “Epiq Retention Application”).

2. Order Authorizing the Employment and Retention of Epiq Corporate Restructuring, LLC as Claims, Noticing and Solicitation Agent [Dkt. 39].
3. Debtor’s Preliminary Response to Coalition Motion to Vacate [Dkt. 260].
4. Debtor’s Objection to the Coalition Motion to Vacate and the UST Motion to Reconsider [Dkt. 422].
5. Joinder of the Ad Hoc Committee of Supporting Counsel to Debtor’s Objection to the Coalition Motion to Vacate and the UST Motion to Reconsider [Dkt. 429].
6. The SLF Claimants’ Objection and Joinder.
7. Reply in Support of the Coalition Motion to Vacate [Dkts. 627, 628].
8. The Beville Declaration.
9. The Coalition Motion to Seal November 22, 2024 Replies.
10. Supplemental Declaration of Kathryn Tran in Support of the Epiq Retention Application [Dkt. 725].
11. The Newsome Joinder to Certain Coalition Pleadings.

E. Motion of the Coalition of Counsel for Justice for Talc Claimants for Entry of an Order Designating Votes Pursuant to 11 U.S.C. § 1126(e) [Dkt. 265] (the “Vote Designation Motion”).

Status: This matter is going forward.

Related Documents:

1. Omnibus Objection of the Ad Hoc Committee of Supporting Counsel to the Motions of the Coalition of Counsel for Justice for Talc Claimants (a) Designating Votes (Dkt. No. 265), (b) Reinstating Votes (Dkt. No. 266), and (C) Establishing Estimation Procedures and Scheduling Estimation Proceedings (Dkt. No. 267) [Dkt. 427] (the “AHC Objection to Coalition Vote and Estimation Motions”).
2. Debtor’s Objection to the Vote Designation Motion [Dkt. 428].
3. Supplemental Declaration of John K. Kim in Support of the Debtor’s Objections to the Coalition’s (I) Designation Motion, (II) Reinstatement Motion and (III) Estimation and Bar Date Motions [Dkt. 433] (the “Kim Vote, Estimation and Bar Date Motions Declaration”).

4. The SLF Claimants' Objection and Joinder.
5. Omnibus Reply in Support of Motions of the Coalition of Counsel for Justice for Talc Claimants to (A) Designate Votes Pursuant to 11 U.S.C. § 1126(e) (Dkt. No. 265), and (B) Reinstate Votes Improperly Modified By The Smith Law Firm (Dkt. No. 266) [Dkts. 625, 626] (the "Coalition Vote Motions Reply").
6. The Beville Declaration.
7. The Coalition Motion to Seal November 22, 2024 Replies.

F. Motion of the Coalition of Counsel for Justice for Talc Claimants for Entry of an Order Reinstating Votes Improperly Modified By The Smith Law Firm PLLC [Dkt. 266] (the "Vote Reinstatement Motion").

Status: This matter is going forward.

Related Documents:

1. The AHC Objection to the Coalition Vote and Estimation Motions.
2. Debtor's Objection to the Vote Reinstatement Motion [Dkt. 430].
3. The Kim Vote, Estimation and Bar Date Motions Declaration.
4. The SLF Claimants' Objection and Joinder.
5. The Coalition Vote Motions Reply.
6. The Beville Declaration.
7. The Coalition Motion to Seal November 22, 2024 Replies.
8. The Newsome Joinder to Certain Coalition Pleadings.

G. Debtor's Motion for Entry of An Order Confirming the Results of the Voting on the Prepackaged Plan of Reorganization [Dkt. 305] (the "Motion to Confirm Vote").

Status: This matter is going forward.

Related Documents:

1. Supplemental Declaration of John K. Kim in Support of the Motion to Confirm Vote [Dkt. 306].
2. Supplemental Declaration of Stephenie Kjontvedt of Epiq Corporate Restructuring, LLC Regarding the Solicitation and Tabulation of Ballots

Cast on the Prepackaged Chapter 11 Plan of Reorganization of the Debtor [Dkt. 307] (the “Kjontvedt Supplemental Tabulation Declaration”).

3. Joinder of the Ad Hoc Committee of Supporting Counsel to the Motion to Confirm Vote [Dkt. 377].
4. The UST Disclosure Statement Objection.
5. Objection of the Coalition of Counsel for Justice for Talc Claimants to the Motion to Confirm Vote [Dkts. 419, 421] (the “Coalition Vote Objection”).
6. Coalition of Counsel for Justice for Talc Claimants Motion to Seal Vote Objection [Dkt. 420].
7. Joinder of Beasley Allen to the Coalition Vote Objection [Dkt. 423].
8. The SLF Claimants’ Objection and Joinder.
9. The SLF Claimants’ Joinder and Reply.

H. Debtor’s Motion for Entry of an Order Permitting Clients of Morelli Law Firm, PLLC to Change Their Votes [Dkt. 328] (the “Morelli Vote Motion”).

Status: This matter is going forward.

Related Documents:

1. The Coalition of Counsel for Justice for Talc Claimants’ Objection to the Morelli Vote Motion [Dkt. 559].
2. Declaration of Benedict P. Morelli in Support of Morelli Vote Motion [Dkt. 734].
3. Response Letter in Support of Morelli Vote Motion [Dkt. 919].

I. Debtor’s Motion for Entry of an Order Permitting Clients of Summers & Johnson, P.C. to Change Their Votes [Dkt. 731] (the “Summers & Johnson Vote Motion”).

Status: This matter is going forward.

Related Documents:

1. The Coalition of Counsel for Justice for Talc Claimants’ Limited Objection and Reservation of Rights to the Summers & Johnson Vote Motion [Dkt. 865].

J. Second Amended Prepackaged Chapter 11 Plan of Reorganization of the Debtor [Dkt. 722] (the “Second Amended Plan”).

Status: This matter is going forward.

Related Documents:

1. Amended Prepackaged Chapter 11 Plan of Reorganization of the Debtor [Dkt. 24] (the “Amended Plan”).
2. Notice of Filing of Solicitation Versions of the Prepackaged Chapter 11 Plan of the Debtor and Related Disclosure Statement [Dkt. 25].
3. Notice of Filing of Redlines of Amended Plan [Dkt. 26].
4. The Kjontvedt Tabulation Declaration.
5. The Wheatman Declaration.
6. The Coalition Disclosure Statement Objection.
7. Coalition of Counsel for Justice for Talc Claimants’ Notice of Declarations of Claimants Who Oppose the Plan and Authorized Beasley Allen to Vote to Reject the Plan [Dkts. 398-407; 409-418] (the “Claimants’ Declarations”).
8. Coalition of Counsel for Justice for Talc Claimants Motions to Seal Claimants’ Declarations [Dkt. 418, 420].
9. The Insurers’ Disclosure Statement and Plan Objection.
10. The Employers Insurance Joinder to the Insurers’ Disclosure Statement and Plan Objection.
11. Allstate Insurance Company’s Joinder to Insurers’ Disclosure Statement and Plan Objection [Dkt. 459].
12. The WSJ Affidavit.
13. The USA Today Affidavit.
14. Response of SLF and the SLF Claimants to the Claimants’ Declarations [Dkt. 494].
15. The NYT Affidavit.
16. Notice of Official Committee of Talc Claimants’ Support for Amended Plan [Dkt. 560].

17. Statement of the Official Committee of Talc Claimants in Support of the Debtor's Chapter 11 Case, Forthcoming Amended Plan and Plan Process [Dkt. 613].
18. Orders Granting Coalition Motions to Seal Claimants' Declarations [Dkts. 703, 704].
19. Sara Lozano Creditor's Objection to Debtor's Amended Plan [Dkt. 706].
20. Limited Objection of Truck Insurance Exchange to Confirmation of the Amended Plan [Dkt. 712].
21. Verification of Publication of Online Banner Campaign for Red River Talc LLC Run November 22, 2024 - December 6, 2024 [Dkt. 719].
22. Debtor's Notice of Filing of (I) Redline of the Second Amended Plan and (II) Certain Exhibits Thereto [Dkt. 724].
23. Objections to Second Amended Plan by Claimant Kevin Nesko [Dkt. 972].
24. Allstate Insurance Company, Solely as Successor in Interest to Northbrook Excess & Surplus Insurance Company, Formerly Northbrook Insurance Company's Objection to Confirmation of the Plan [Dkt. 973].
25. Objection by ACE Property & Casualty Company, Century Indemnity Company, Great Northern Insurance Company, Pacific Employers Insurance Company, and Westchester Fire Insurance Company to Confirmation of the Plan [Dkt. 975].
26. United States Trustee's Objection to Confirmation of Second Amended Plan of Reorganization [Dkts. 980, 996].
27. Certain Insurers' Objection to Confirmation of the Plan [Dkt. 981].
28. Limited Joinder by Employers Insurance Company of Wausau and National Casualty Company to Certain Insurers' Objections to Plan Confirmation [Dkt. 982].
29. Limited Objection of Truck Insurance Exchange to Confirmation of the Second Amended Prepackaged Chapter 11 Plan of Reorganization of the Debtor [Dkts. 983, 986].
30. United States of America's Objection to the Second Amended Prepackaged Chapter 11 Plan of Reorganization of the Debtor [Dkt. 984].

31. TIG Insurance Company, The North River Insurance Company, and Everest Reinsurance Company's Objection to Confirmation of the Plan [Dkt. 985].
32. Objection of Claimants Represented by Barnes Law Group, LLC to Debtor's Second Amended Prepackaged Chapter 11 Plan of Reorganization (Dkt. No. 722) [Dkt. 987].
33. Objection of the Coalition of Counsel for Justice for Talc Claimants to the Confirmation of the Second Amended Plan of Reorganization [Dkts. 988, 990] (the "Coalition Second Amended Plan Objection").
34. Motion of the Coalition of Counsel for Justice for Talc Claimants to File Coalition Second Amended Plan Objection Under Seal and Redact Certain Exhibits Referenced in the Objection [Dkt. 989].
35. Joinder of Elizabeth Ashley Prather to the Objections of (1) the US Trustee and (2) the Coalition of Counsel for Justice for Talc Claimants to the Confirmation of the Second Amended Plan of Reorganization [Dkt. 991].
36. Joinder of Beasley Allen to the Coalition Second Amended Plan Objection [Dkt. 993].
37. Joinder of Golomb Legal, P.C. to the Coalition Second Amended Plan Objection [Dkt. 994].
38. Joinder of Claimants Represented by Barnes Law Group, LLC to the Objections of the United States Trustee (Dkt. No. 980) and the Coalition of Counsel for Justice for Talc Claimants (Dkt. No. 988) to the Confirmation of the Second Amended Plan of Reorganization (Dkt. No. 722) [Dkt. 997].
39. Limited Joinder of Sue Sommer-Kresse to the Objections of (1) the United States Trustee; and (2) the Coalition of Counsel for Justice for Talc Claimants to the Confirmation of the Second Amended Plan of Reorganization [Dkt. 998].
40. Amended Joinder of Firms to the Coalition Second Amended Plan Objection [Dkt. 1008].
41. Objection of Randi S. Ellis as the Future Claimants' Representative to the Debtor's Second Amended Plan [Dkt. 1014].
42. Objection of Personal Care Products Council to Confirmation of the Second Amended Prepackaged Chapter 11 Plan of Reorganization of the Debtor [Dkt. 1066] (the "PCPC Objection").

43. Reservation of Rights of Certain Retailers With Respect to the Second Amended Prepackaged Chapter 11 Plan of Reorganization of the Debtor [Dkt. 1067].
44. Claimant Kevin Nesko's Response to the PCPC Objection [Dkt. 1071].
45. Certification of Charles Siegal in Support of Claimant Kevin Nesko Response to PCPC Objection [Dkt. 1072].
46. Debtor's Memorandum of Law in Support of Confirmation of the Second Amended Plan [Dkts. 1075, 1076].
47. Debtor's Motion to Seal the Memorandum of Law in Support of Confirmation of the Second Amended Plan [Dkt. 1077].
48. The Newsome Joinder to Certain Coalition Pleadings.

K. Motion of the Coalition of Counsel for Justice for Talc Claimants for Entry of an Order (I) Establishing a Deadline for Filing Proofs of Claim, (II) Approving the Proposed Model Claim Form for Talc Personal Injury Claims and Related Procedures and (III) Directing the Debtor to Provide Adequate Notice of the Deadline for Filing Proofs of Claim to all Talc Personal Injury Claimants [Dkt. 264] (the "Bar Date Motion").

Status: This matter is going forward.

Related Documents:

1. U.S. Trustee's Consolidated Reservation of Rights with Respect to the Coalition of Counsel for Justice for Talc Claimants Bar Date Motion (ECF No. 264) and Motion for Entry of an Order Authorizing an Estimation of Current Talc Claims for Voting Purposes (ECF No. 267) [Dkt. 396] (the "UST Bar Date and Estimation Motions ROR").
2. The Ad Hoc Committee of Supporting Counsel Joinder to the Debtor's Objection to the Bar Date Motion [Dkt. 431].
3. The Debtor's Joint Objection to the Bar Date Motion and the Coalition Of Counsel For Justice For Talc Claimants Motion For An Estimation Of Current Talc Claims For Voting Purposes And Related Relief [Dkt. 432] (the "Debtor Objection to Bar Date and Estimation Motions").
4. The Kim Vote, Estimation and Bar Date Motions Declaration.
5. The SLF Claimants' Objection and Joinder.
6. Omnibus Reply in Support of the (A) Bar Date Motion and (B) Motion to Establish Estimation Procedures and Schedule Estimation Proceedings

(Dkt. No. 267) [Dkts. 621, 622] (the “Reply in Support of the Bar Date and Estimation Motions”).

7. The Beville Declaration.
8. The Coalition Motion to Seal November 22, 2024 Replies.
9. The Newsome Joinder to Certain Coalition Pleadings.

L. Motion of the Coalition of Counsel for Justice for Talc Claimants for Entry of an Order (I) Authorizing an Estimation of Current Talc Claims for Voting Purposes, and (II) Establishing Procedure and Schedule for Estimation Proceedings [Dkt. 267] (the “Estimation Motion”).

Status: This matter is going forward.

Related Documents:

1. The UST Bar Date and Estimation Motions ROR.
2. The AHC Objection to Coalition Vote and Estimation Motions.
3. The Debtor Objection to Bar Date and Estimation Motions.
4. The Kim Vote, Estimation and Bar Date Motions Declaration.
5. The SLF Claimants’ Objection and Joinder.
6. The Reply in Support of the Bar Date and Estimation Motions.
7. The Beville Declaration.
8. The Coalition Motion to Seal November 22, 2024 Replies.
9. The Newsome Joinder to Certain Coalition Pleadings.

II. Pre-Trial Briefs

1. Pre-Trial Brief of the Coalition of Counsel for Justice for Talc Claimants [Dkts. 1106, 1108] (the “Coalition Brief”).

Related Document:

- (a) Motion to Seal Coalition Brief [Dkt. 1107].
2. Ad Hoc Committee of Supporting Counsel’s Memorandum of Law in Support of Confirmation of the Second Amended Plan [Dkt. 1109].

3. Debtor's Pretrial Brief [Dkts. 1110, 1111].

Related Document:

- (a) Motion to Seal Debtor's Pretrial Brief [Dkt. 1112].
4. The SLF Claimants' (I) Omnibus Reply in Support of the Second Amended Plan and (II) Pre-Trial Brief [Dkts. 1114, 1115] (the "SLF Claimants' Brief").

Related Document:

- (a) Motion to Seal SLF Claimants' Brief [Dkt. 1113].
5. Travelers' Pre-Trial Submission [Dkts. 1116, 1118].

Related Document:

- (a) Motion to Seal Travelers' Pre-Trial Submission [Dkt. 1117].

III. Related Documents.

1. Witness and Exhibit List of Plaintiff Brandi Carl [Dkt. 1009].
2. Witness and Exhibit List of Claimants Represented by Barnes Law Group, LLC [Dkt. 1061].
3. Witness and Exhibit List of Plaintiff Kevin Nesko [Dkts. 1099, 1137, 1149].
4. Witness and Exhibit List of Claimant Tamara Newsome for Hearing Beginning on February 18, 2025 [Dkt. 1127].
5. Personal Care Products Council's Witness and Exhibit List for Hearing On February 18, 2025 [Dkt. 1129].
6. Exhibit List of Randi S. Ellis, in Her Capacity as Future Claimants' Representative, for Hearing Scheduled for February 18, 2025, at 9:00 a.m. (Central Time) [Dkt. 1130].
7. Motion of Plaintiff Kevin Nesko to File Under Seal Certain Exhibits Attached to His Witness and Exhibit List [Dkt. 1138].
8. The Official Committee of Talc Claimants' Witness and Exhibit List for Hearing Scheduled for February 18, 2025, at 9:00 a.m. (prevailing Central Time) [Dkt. 1139].

9. Debtor's Witness List in Connection With the Consolidated Hearing on February 18, 2025 [Dkt. 1140].
10. Coalition of Counsel for Justice for Talc Claimants' Final Witness and Exhibit List for Omnibus Hearing Commencing February 18, 2025 [Dkt. 1141].
11. Travelers' Witness and Exhibit List for February 18-28, 2025 Consolidated Hearing [Dkt. 1145].
12. U.S. Trustee's Exhibit List in Connection with Hearings Beginning on February 18, 2025 [Dkts. 1146, 1148].
13. U.S. Trustee's Witness List in Connection With Hearing Set to Begin February 18, 2025 [Dkt. 1147].
14. SLF's Witness and Exhibit Lists for Confirmation Hearing [Dkt. 1150].
15. Joint Master Exhibit List for Consolidated Hearing Beginning February 18, 2025 [Dkts. 1151, 1155, 1156, 1157].
16. Debtor's Exhibit List for Consolidated Hearing Beginning February 18, 2025 [Dkt. 1152].
17. Ad Hoc Committee of Supporting Counsel's Witness and Exhibit List for Combined Hearing [Dkt. 1153].
18. Witness List of Randi S. Ellis, in Her Capacity as Future Claimants' Representative, for Hearing Scheduled for February 18, 2025, at 9:00 a.m. (Central Time) [Dkt. 1154].
19. Debtor's Motion for Entry of an Order Authorizing Filing Under Seal of Certain Exhibits for Consolidated Hearing Scheduled for February 18, 2025 [Dkt. 1158].

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Dated: February 16, 2025
Houston, Texas

Respectfully submitted,

/s/ John F. Higgins
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PROPOSED ATTORNEYS FOR DEBTOR

Certificate of Service

I certify that on February 16, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas, and will be served as set forth in the Affidavit of Service to be filed by the Debtor's claims, noticing and solicitation agent.

/s/ John F. Higgins
John F. Higgins